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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO.

v.

ABDUL HADI MURSHID (01)  
MUHAMMAD SALMAN NASIR (02)  
LAW OFFICES OF D. ROBERT JONES PLLC (03)  
and  
RELIABLE VENTURES, INC. (04)**FILED UNDER SEAL****3-25CR-222 S****INDICTMENT**

The Grand Jury charges:

At all times material to this Indictment:

**General Allegations****Summary of the Scheme**

1. From on or about January 1, 2018, through on or about May 21, 2025, defendants **Abdul Hadi Murshid, Muhammad Salman Nasir, Law Offices of D. Robert Jones PLLC, Reliable Ventures, Inc.**, and others, engaged in a scheme to commit visa fraud to enrich themselves and others, and to cause individuals to fraudulently obtain entry into and immigration status in the United States. That is, **Murshid, Nasir**, and others submitted and caused to be submitted false and fraudulent visa applications, for individuals who were not United States citizens (hereinafter referred to as “visa seekers”), and applications to adjust status of the visa seekers so the visa seekers could enter and remain in the United States. **Murshid, Nasir**, and others submitted the applications and related documents utilizing the **Law Offices of D. Robert**

Jones PLLC (“Law Office of Robert D. Jones”), and utilized **Reliable Ventures, Inc.** (“**Reliable Ventures**”) to facilitate the scheme to defraud.

EB-2 and EB-3 Visa Program

2. The EB-2 visa program allowed foreign nationals with advanced degrees or a foreign equivalent to be employed by U.S. companies and apply for lawful permanent resident (“LPR”) status.

3. The EB-3 visa program allowed foreign nationals who were skilled workers to be employed by U.S. companies and to apply for LPR status.

4. Before hiring a foreign national under the EB-2 or EB-3 visa program, an employer first had to obtain a prevailing wage determination from the Department of Labor (“DOL”) for the specific position being offered to the foreign national. The employer must have also certified to the DOL: the employment position being offered to the foreign national; the job description; and the rate of pay, in an “Application for Permanent Employment Certification,” Form ETA-9089 (hereinafter “Form ETA-9089 Application”). Through the Form ETA-9089, the petitioning employer certified that it needed to fill a full-time, permanent job at fair market compensation, and that the petitioning business made a good faith effort to hire a United States citizen prior to filing the Form ETA-9089 Application, through advertising the job in newspapers, online, or at job fairs.

5. Upon the DOL’s certification of the Form ETA-9089 Application to hire the foreign national for the stated position, and at the rate of pay, the employer was next required to petition the United States Citizenship and Immigration Services (“USCIS”)

for the EB-2 or EB-3 visa on behalf of the foreign national. The employer was required to submit an “Immigrant Petition for Alien Workers,” Form I-140 (hereinafter “Form I-140 Petition”), as well as supporting documentation with information including, the foreign national’s job title with the employer, the job description, and the rate of pay.

6. For an EB-2 visa, as part of the Form I-140 Petition, the employer was required to submit an official academic record showing that the foreign national had a United States advanced degree or an equivalent foreign degree. If the foreign national did not possess an advanced degree, the employer was required to submit an official academic record showing the foreign national had a U.S. baccalaureate degree or an equivalent foreign degree and letters from current or former employers showing the foreign national had at least five years of progressive post-baccalaureate experience in the specialty.

7. For an EB-3 visa, the employer was required to submit evidence showing that the foreign national met the education, training, experience, and any other requirements for the stated position with at least two years of training or experience. Relevant post-secondary education could satisfy this training requirement.

8. For all EB-2 and EB-3 petitions, the employer was required to submit evidence showing that the foreign national had the required experience or special skills for the position.

9. If USCIS approved the Form I-140 Petition, the foreign national was typically required to appear for an interview at an overseas United States’ embassy or

consulate, or, if already in the United States, the foreign national's EB-2 or EB-3 visa status was approved.

10. Once the foreign national's Form I-140 Petition was approved, and the foreign national was issued either an EB-2 or EB-3 visa, the foreign national became eligible to obtain LPR status by filing an "Application to Register Permanent Residence or Adjust Status," USCIS Form I-485 (hereinafter "Form I-485 Application").

11. A "Confirmation of Valid Job Offer or Request for Job Portability Under INA Section 204(j)," Form I-485, Supplement J (hereinafter "Form 485J Supplement"), was filed by a foreign national to confirm that the job offered to him/her in a Form I-140 Petition was still valid. A Form 485J Supplement was also used by a foreign national to request job portability to a new, full-time, permanent job offer the foreign national intended to accept when USCIS approves the pending Form I-485 Application.

12. Once the foreign national's Form I-485 and, if necessary, Form 485J Supplement, were approved, USCIS mailed the foreign national a "Permanent Resident Card," Form I-551, also known as a "Green Card" (hereinafter "Green Card"). A Green Card allowed the foreign national to live and work permanently in the United States.

13. Employers could retain a lawyer to assist with the EB-2 and EB-3 visa process, including by preparing petitions on behalf of employers and communicating with the DOL and USCIS about the petitions.

#### H-1B Visa Program

14. The H-1B visa program allowed foreign nationals to obtain temporary status to obtain employment in specialty occupations.

15. Before hiring a foreign national under the H-1B visa program, the employer was required to file a “Labor Condition Application for Nonimmigrants Workers,” DOL Form ETA-9035E (hereinafter “Form ETA-9035E Application”). In the Form ETA-9035E, the employer was required to identify the number of foreign nationals to be employed, the location of the employment, and the wages to be paid.

16. Upon the DOL’s approval of Form ETA-9035E, the employer submitted a “Petition for Nonimmigrant Worker,” Form I-129. In the Form I-129 Petition, the employer identified the foreign national to be employed, provided information about the proposed employment, including job title, work location, and compensation, and provided information about the petitioning company, including the type of business, the number of employees and the company’s income.

17. Upon USCIS’s approval of the Form I-129 Petition, the foreign national was typically required to appear for an interview at an overseas United States embassy or consulate, or, if already in the United States, the foreign national’s H-1B visa status was approved.

18. The H-1B visa program was subject to annual numerical quotas. An H-1B was normally valid for three years and could be renewed.

19. Employers and visa seekers could retain immigration lawyers to assist with the H-1B visa process, including by preparing petitions on behalf of employers and communicating with DOL and USCIS about the petitions.

Premium Processing Service

20. For EB-2, EB-3, and H-1B visas, the foreign national may file “Request for Premium Processing,” Form I-907. An attorney for the foreign national or the foreign national’s employer may file the Form I-907.

21. Based on the Form I-907 petition, USCIS may issue an approval notice, a denial notice, a notice of intent to deny, or a request for evidence on the immigration benefit request within a certain processing timeframe. The length of the processing timeframe for EB-2, EB-3 and H-1B visas was typically approximately 15 days.

Defendants

22. On or about December 5, 2012, H.K., a naturalized United States citizen, submitted and caused to be submitted a “Petition for Alien Relative,” Form I-130, on behalf of defendant **Abdul Hadi Murshid**. According to the Form I-130, **Murshid** was born in Lahore, Pakistan, and was a national of Pakistan. On or about March 23, 2013, **Murshid’s** Form I-130 was approved. Thereafter, on or about April 14, 2014, **Murshid** submitted and caused to be submitted an Immigrant Visa Electronic Application, Form DS-260, which was granted on or about August 5, 2014, authorizing **Murshid** to enter the United States on a “Conditional Resident,” CR-1 visa. On or about September 5, 2014, **Murshid** entered the United States and was issued an “Immediate Relative,” IR-1 visa providing him with LPR status.

23. On or about December 6, 2014, defendant **Muhammad Salman Nasir** entered the United States on a nonimmigrant F1 student visa. **Nasir’s** F1 student visa

authorized him to attend a university in Oklahoma. **Nasir** was born in Islamabad, Pakistan and was a national of Pakistan.

24. On or about December 8, 2014, defendant **Muhammad Salman Nasir** caused a Bank of America, National Association (“Bank of America”) account number ending in 1585 to be opened in his name. **Nasir** had sole signature authority on the account.

25. On or about February 26, 2015, defendant **Abdul Hadi Murshid** caused a Wells Fargo Bank, National Association (“Wells Fargo Bank”) account number ending in 5222 to be opened in his name. **Murshid** had sole signature authority on the account.

26. On or about June 6, 2017, defendant **Abdul Hadi Murshid** submitted and caused to be submitted an “Application for Naturalization,” Form N-400, (hereinafter “Form N-400 Application”) to USCIS. At the time **Murshid** submitted his Form N-400 Application, **Murshid** listed his employer as Law Firm-1, and that he had been employed at Law Firm-1 since on or about May 1, 2015, as an “immigration manager.” The named partner of Law Firm-1 represented **Murshid** at the time **Murshid’s** Form N-400 Application was submitted to USCIS.

27. In his Form N-400 Application, defendant **Abdul Hadi Murshid** answered “no” when asked:

- a. “Have you **EVER** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **NOT** arrested;”
- b. “Have you **EVER** given any U.S. Government officials **any** information or documentation that was false, fraudulent, or misleading;” and

c. “Have you **EVER** lied to any U.S. Government officials to gain entry or admission into the United States or to gain immigration benefits while in the United States?”

As part of **Murshid’s** N-400 Application, **Murshid** certified, “under penalty of perjury,” that all of the information in the application and any documents submitted with the application were “complete, true, and correct.”

28. On or about August 18, 2018, the **Law Offices of D. Robert Jones** submitted and caused to be submitted an “Application for Permanent Employment Certification,” Form 9089 Application, purportedly on behalf of a certified public accounting firm in Milpitas, California (“CPA Firm”) to the DOL. The alien identified in the Form 9089 Application was defendant **Muhammad Salman Nasir**. The email address listed for in the agent or attorney in the application was murshid@drj.legal. On or about October 15, 2018, DOL certified the application.

29. On or about September 21, 2018, defendant **Abdul Hadi Murshid** was interviewed by a USCIS officer about his Form N-400 Application in Irving, Texas. As part of the interview, **Murshid** was placed under oath and questioned about his application for naturalization. During the interview, **Murshid** told the USCIS officer that his employer was now the **Law Offices of D. Robert Jones**, at the same address used by Law Firm-1, that his position was an “immigration manager,” and that the **Law Offices of D. Robert Jones** had been his employer since April 2018. At the conclusion of the interview, **Murshid** signed the application under of penalty perjury and acknowledged

the changes documented on the application. On or about October 16, 2018, **Murshid's** “Application for Naturalization,” Form N-400, was granted.

30. On or about October 30, 2018, the **Law Offices of D. Robert Jones** submitted and caused to be submitted an “Immigrant Petition for Alien Worker,” Form I-140 Petition, purportedly on behalf of the CPA Firm to USCIS for defendant **Muhammad Salman Nasir**. According to the Form I-140 Petition, **Nasir** was going to purportedly work as a “management analyst” at the CPA Firm in Milpitas, California. In support of the Form I-140 Petition, a letter purportedly signed by S.G., on behalf of the CPA Firm, dated October 30, 2018, addressed to **Nasir** was submitted. The letter purported to be a job offer to **Nasir** as a “management analyst” in Milpitas, California at the CPA Firm. Additionally, a copy of the certified Form 9089 Application was submitted in support that was purportedly signed by S.G. and dated October 23, 2018. Thereafter, on or about November 9, 2018, **Nasir's** Form I-140 Petition was granted, and **Nasir** was issued an EB-3 visa.

31. On or about November 1, 2018, defendant **Abdul Hadi Murshid** appeared in Irving, Texas, for his naturalization ceremony. Prior to taking the oath to become a naturalized United States citizen, **Murshid** provided a Form N-445 to the USCIS officer which asked questions about the time period between his USCIS interview on or about September 1, 2018, and the date of his naturalization ceremony. **Murshid** answered “no” to the question, “Since your interview, have you knowingly committed any crime or offense, for which you have not been arrested?” Thereafter, **Murshid** was sworn in as a naturalized United States citizen.

32. On or about December 31, 2018, defendant **Muhammad Salman Nasir** submitted and caused to be submitted an “Application to Register Permanent Residence or Adjust Status,” USCIS Form I-485 (“Form I-1485 Application”), to become an LPR of the United States. The **Law Offices of D. Robert Jones** submitted **Nasir’s** Form I-485 Application to USCIS, with a purported “Job Offer Letter” from the CPA Firm that was purportedly signed by S.G. for **Nasir** to work at the CPA Firm in Milpitas, California as a “management analyst.”

33. In his Form I-485 Application, defendant **Muhammad Salman Nasir** answered “no” when asked:

- a. “Have you **EVER** committed a crime of any kind (even if you were not arrested, cited, charged with, or tried for that crime);”
- b. “Have you **EVER** engaged in money laundering or have you **EVER** knowingly aided, assisted, conspired, or colluded with others in money laundering or do you seek to enter the United States to engage in such activity;”
- c. “Have you **EVER** submitted fraudulent or counterfeit documentation to any U.S. Government official to obtain or attempt to obtain any immigration benefit, including a visa or entry into the United States;”
- d. “Have you **EVER** lied about, concealed, or misrepresented any information on an application or petition to obtain a visa, other documentation required for entry into the United States, admission to the United States, or any other kind of immigration benefit;” and

e. “Have you **EVER** knowingly encouraged, induced, assisted, abetted, or aided any foreign national to enter or to try to enter the United States illegally (alien smuggling)?”

As part of **Nasir’s** Form I-485 Application, **Nasir** certified, “under penalty of perjury, that all of the information” in the application and any documents submitted with the application were “complete, true, and correct.”

34. Thereafter, on or about October 1, 2019, defendant **Muhammad Salman Nasir** was interviewed by a USCIS officer about his Form I-485 Application in Irving, Texas. **Nasir** did not identify any changes or corrections that needed to be made to his Form I-485 during the interview. At the conclusion of the interview, **Nasir** signed the application under penalty perjury that the information contained in the application was true and correct. Thereafter, **Nasir’s** application to become an LPR was granted, and he became an LPR.

35. On or about July 22, 2024, defendant **Muhammad Salman Nasir** submitted and caused to be submitted an “Application for Naturalization,” Form N-400, to USCIS. At the time **Nasir** submitted his Form N-400 Application, he listed his employer as defendant **Reliable Ventures**, and that he began employment with **Reliable Ventures** on or about July 1, 2023. Prior to his employment with **Reliable Ventures**, **Nasir** identified his employer as the **Law Offices of D. Robert Jones** and that he was employed with the law office between on or about April 1, 2020, and June 30, 2023. **Nasir** listed his employer prior to the law office as the CPA Firm in Dallas, Texas between on or about October 1, 2019 and March 31, 2020.

36. In his Form N-400 Application, defendant **Muhammad Salman Nasir** answered “no” when asked:

- a. “Have you **EVER** committed, agreed to commit, asked someone else to commit, helped commit, or tried to commit a crime or offense for which you were **NOT** arrested;”
- b. “Have you **EVER** given any U.S. Government officials **any** information or documentation that was false, fraudulent, or misleading;” and
- c. “Have you **EVER** lied to any U.S. Government officials to gain entry or admission into the United States or to gain immigration benefits while in the United States?”

As part of **Nasir’s** N-400 Application, **Nasir** certified, “under penalty of perjury,” that all of the information in the application and any documents submitted with the application were “complete, true, and correct.”

Defendants’ Real Properties

37. On or about December 13, 2019, defendant **Abdul Hadi Murshid** and H.K. purchased the real property located at 1432 Benavites Drive, Little Elm, Texas. On or about December 9, 2024, **Murshid** obtained a mortgage loan to refinance the loan on the real property. As a result of the refinance, approximately \$228,224.93 was due and payable at closing to the borrower. **Murshid** and H.K. caused the title company to issue a wire for the money due and payable to the borrower to be deposited into JP Morgan Chase, National Association (“Chase Bank”) account number ending in 8922 in H.K.’s

name. On or about April 2, 2025, **Murshid** executed a Special Warranty Deed transferring his interest in the real property to H.K.

38. On or about April 16, 2020, defendant **Muhammad Salman Nasir** and R.S. purchased the real property located at 7901 Fossil Creek Trail, McKinney, Texas.

39. On or about May 1, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir** purchased the real property located at 1684 County Road 3318, Greenville, Texas in the name of **Reliable Ventures**.

40. On or about May 19, 2023, defendant **Muhammad Salman Nasir** and R.S. purchased the real property located at 4060 Woodbine Lane, Prosper, Texas.

Defendants' Entities and Defendant Entities

41. On or about November 24, 2015, Zoya Wireless Inc. ("Zoya Wireless") was incorporated in the state of Texas, and defendant **Muhammad Salman Nasir** was listed as president and director between on or about May 27, 2020 and December 31, 2020.

42. On or about August 12, 2017, CarClub LLC ("CarClub") was formed in the state of Texas, and Law Firm-1 was the initial registered agent. Thereafter, defendant **Abdul Hadi Murshid** was added as managing members on various dates.

43. On or about March 5, 2018, defendant **Law Offices of D. Robert Jones** was formed as a professional limited liability company in the state of Texas. Thereafter, the **Law Offices of D. Robert Jones** was located in the Northern District of Texas. In or about 2018, the **Law Offices of D. Robert Jones** began handling the clients and work previously being conducted by Law Firm-1. Attorney 1 was a partner at the **Law Offices**

of D. Robert Jones from formation until on or about November 28, 2022. On or about October 3, 2022, Attorney 2 became a partner at the **Law Offices of D. Robert Jones**.

44. On or about December 12, 2018, defendant **Reliable Ventures** was incorporated in the state of Texas. Defendant **Abdul Hadi Murshid** was listed as a director and defendant **Law Offices of D. Robert Jones** was listed as the organizer of **Reliable Ventures**. On or about March 5, 2020, defendant **Muhammad Salman Nasir** was added as a director. **Reliable Ventures** business addresses were in the Northern District of Texas.

45. On or about November 21, 2019, Status One Business Consulting Inc. (“Status One Business Consulting”) was incorporated in the state of Texas, and defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir** were listed as directors.

46. On or about March 10, 2020, Copain Affairs Inc. (“Copain Affairs”) was incorporated in the state of Texas, and defendant **Muhammad Salman Nasir** was listed as a director. Thereafter, an Assumed Name Certificate was filed with the Texas Secretary of State assuming the name Paradise Home. Paradise Home’s business address was listed as 7901 Fossil Creek Trail, McKinney, Texas.

47. On or about September 16, 2020, Texas Estate Ventures Inc. (“Texas Estate Ventures”) was incorporated in the state of Texas, and defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir** were listed as directors.

48. On or about June 25, 2021, S&K Limo Corporation (“S&K Limo”) was incorporated in the states of Texas, and defendant **Muhammad Salman Nasir** was listed as a director.

49. On or about September 10, 2021, Capital Engineering Services Inc. (“Capital Engineering Services”) was incorporated in the state of Texas and defendant **Muhammad Salman Nasir** was listed as a director. The entity’s business address was listed as 7901 Fossil Creek Trail, McKinney, Texas. Thereafter, a Certificate of Amendment was filed with the Texas Secretary of State changing the entity’s name to Capital Enterprise Services Inc. (“Capital Enterprise Services”).

50. On or about November 1, 2022, Hideout Ventures LLC (“Hideout Ventures”) was formed in the state of Texas, and defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir** were listed as members. Hideout Ventures business address was listed as 1432 Benavites Drive, Little Elm, Texas.

51. On or about November 10, 2021, Bhavy Financial Services LLC (“Bhavy Financial Services”) was formed in the state of Texas, and thereafter defendant **Muhammad Salman Nasir** was listed as a managing member.

52. On or about January 31, 2022, Zavian Investment Inc. (“Zavian Investment”) was incorporated in the state of Texas, and defendant **Muhammad Salman Nasir** was listed as a director. Zavian Investment business address was listed as 7901 Fossil Creek Trail , McKinney, Texas.

53. On or about January 31, 2022, SRZ Enterprises Inc. (“SRZ Enterprises”) was incorporated in the state of Texas, and R.S. was listed as the director and registered

agent. SRZ Enterprises business address was listed as 7901 Fossil Creek Trail , McKinney, Texas.

54. On or about April 15, 2022, Murshid Investments Inc. (“Murshid Investments”) was incorporated in the state of Texas and defendant **Abdul Hadi Murshid** was listed as a director. Murshid Investments business address was listed as 1432 Benavites Drive, Little Elm, Texas.

55. On or about November 15, 2022, Laser Boss Med Spa LLC (“Laser Boss Med Spa”) was organized in state of Texas, and defendant **Abdul Hadi Murshid** was listed the organizer. Laser Boss Med Spa business address was as 1432 Benavites Drive, Little Elm, Texas.

56. On or about March 18, 2023, Skin Hub Medspa & Salon LLC (“Skin Hub Medspa”) was formed in the state of Texas, and defendant **Abdul Hadi Murshid** was listed as the registered agent. Skin Hub Medspa business address was listed as 1432 Benavites Drive, Little Elm, Texas.

57. On or about January 25, 2024, GraceBridge Consulting Group LLC (“GraceBridge Consulting Group”) was formed in the state of Texas and defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir** were listed as managing members. GraceBridge Consulting Group business address was listed as 4060 Woodbine Lane, Prosper, Texas.

58. On or about October 12, 2024, UnNaked LLC (“UnNaked”) was formed in the state of Texas, and defendant **Abdul Hadi Murshid** was listed as the organizer, with

defendant **Law Offices of D. Robert Jones** address listed. UnNaked business address was listed as 4060 Woodbine Lane, Prosper, Texas.

59. On or about October 31, 2024, MSN Management LLC (“MSN Management”) was organized in the state of Texas, and defendant **Abdul Hadi Murshid** was listed as organizer, with defendant **Law Offices of D. Robert Jones** address listed.

Other Entities

60. Law Firm-1 was a professional limited liability company formed in the state of Texas on or about January 14, 2013. Law Firm-1 was located in Texas.

Purported “Sponsoring” Entities

61. Company 1 was a company located in Grand Prairie, Texas, in the Northern District of Texas.

62. Company 2 was a company located in Irving, Texas, in the Northern District of Texas.

63. Company 3 was a company located in Richardson, Texas.

64. Company 4 was a company located in Irving, Texas, in the Northern District of Texas.

65. Company 5 was a company located in Garland, Texas, in the Northern District of Texas.

66. Company 6 was a company located in Irving, Texas, in the Northern District of Texas.

67. Company 7 was a company located in Irving, Texas, in the Northern District of Texas,

68. Company 8 was a company located in Grand Prairie, Texas, in the Northern District of Texas.

Visa Seekers

69. K.S.A. was a citizen and national of Pakistan born in 1981.
70. K.B. was a citizen and national of Pakistan born in 1994.
71. T.A.D. was a citizen and national of Pakistan born in 1971.
72. M.F. was a citizen and national of Egypt born in 1985.
73. J.M.I. was a citizen and national of Pakistan born in 1978.
74. K.K. was a citizen and national of Pakistan born in 1981.
75. F.S.K. was a citizen and national of India born in 1989
76. S.M. was a citizen and national of the United Kingdom born in Pakistan in 1983.  
77. M.O. was a citizen and national of Nepal born in 1991.
78. A.Q. was a citizen and national of New Zealand born in Pakistan in 1982
79. S.S. was a citizen and national of Pakistan born in 1987.
80. R.S.W. was a citizen and national of Pakistan born in 1998
81. M.S.Z. was a citizen and national of Pakistan born in 1968.

Count One

Conspiracy to Commit Offense and Defraud the United States  
[Violation of 18 U.S.C. § 371 (18 U.S.C. 1546(a))]

82. Paragraphs 1 through 81 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

83. Beginning in or about January 2018, and continuing through on or about May 21, 2025, in the Northern District of Texas and elsewhere, defendants, **Abdul Hadi Murshid, Muhammad Salman Nasir, Law Offices of D. Robert Jones, and Reliable Ventures**, did knowingly conspire, confederate, and agree with each other, and others known and unknown to the Grand Jury, to defraud the United States Citizenship and Immigration Services (“USCIS”), an agency of the United States, for the purpose of impeding, impairing, obstructing, and defeating USCIS’s lawful governmental function of overseeing lawful immigration to the United States; and to commit and attempt to commit certain offenses against the United States, that is, to violate 18 U.S.C. § 1546(a), immigration document fraud, by making under oath and subscribing as true false statements with respect to material facts in applications, affidavits, and other documents required by the immigration laws and regulations prescribed thereunder, and knowingly present applications, affidavits, and other documents which contain such false statements.

Purpose of the Conspiracy

84. It was the purpose of the conspiracy for defendants **Abdul Hadi Murshid, Muhammad Salman Nasir, Law Offices of D. Robert Jones, and Reliable Ventures** to wrongfully enrich themselves by receiving payments from visa seekers, submitting

false and fraudulent applications and other documents to USCIS as part of the visa seekers' application to obtain visas and to remain in the United States.

Manner and Means of the Conspiracy

85. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

- a. Defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir** and other conspirators identified foreign nationals who sought to immigrate to the United States or, if the foreign nationals were already in the United States, to receive a Green Card.
- b. Defendants **Abdul Hadi Murshid**, **Muhammad Salman Nasir**, **Law Offices of D. Robert Jones**, **Reliable Ventures**, and other conspirators caused classified advertisements to be placed in a daily periodical that has distribution in the Northern District of Texas, and elsewhere, for purported jobs (meeting the definition of that required for EB-2, EB-3, H1-B visas). The classified advertisements were in the name of **Reliable Ventures**, third party businesses, some of whom knowingly allowed their companies to be utilized, and other third party victim businesses that did not know the business' information was being used.
- c. Thereafter, defendants **Abdul Hadi Murshid**, **Muhammad Salman Nasir**, and other conspirators, using the **Law Offices of D. Robert Jones** as the preparer's business, caused ETA Form-9089s to be submitted to DOL in the name of **Reliable Ventures** and in the name of the third party

businesses. Following DOL's review, a labor certification was issued by DOL which was then used by **Murshid, Nasir**, and others in the visa process.

- d. Defendants **Abdul Hadi Murshid, Muhammad Salman Nasir**, and other conspirators prepared and caused to be submitted I-140 Petitions, using **Law Offices of D. Robert Jones** as the preparer's business, with the purported employer listed as **Reliable Ventures**, or the third-party businesses. Once USCIS approved the I-140, an EB-2 or EB-3 visa was issued to the foreign national.
- e. At the time the I-140 Petition was submitted, or following its approval by USCIS, defendants **Abdul Hadi Murshid, Muhammad Salman Nasir**, and other conspirators, caused an I-485 application to be submitted to USCIS so the visa seeker would also receive a Green Card, which is a step in the process to become a U.S. citizen.
- f. Defendants **Abdul Hadi Murshid, Muhammad Salman Nasir**, and other conspirators used the bank accounts of the **Law Offices of D. Robert Jones, Reliable Ventures**, and others to receive payment from visa seekers, and then return a portion of the money back to the visa seeker as purported payroll to the visa seeker.

Overt Acts

86. In furtherance of the conspiracy and to affect its unlawful objects, the defendants **Abdul Hadi Murshid, Muhammad Salman Nasir, Law Offices of D.**

**Robert Jones, Reliable Ventures** and other conspirators committed and caused to be committed the following overt acts in the Northern District of Texas and elsewhere:

- a. On or about March 12, 2018, Attorney 1 opened Dallas Capital Bank account number ending in 4162 in the name of **Law Offices of D. Robert Jones**. Attorney 1 had sole signature authority on the bank account, and defendant **Abdul Hadi Murshid** had various forms of authority and access to the account.
- b. On or about December 12, 2018, defendant **Abdul Hadi Murshid** and other conspirators caused to be filed with the Texas Secretary of State Articles of Incorporation for **Reliable Ventures**. On or about December 13, 2018, **Murshid**, and other conspirators, caused a Bank of America account number ending in 2497 to be opened in the name of **Reliable Ventures**.
- c. On or about November 24, 2019, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, placed and caused to be placed an advertisement for employment in a newspaper for Company 5.
- d. On or about March 5, 2020, defendant **Abdul Hadi Murshid**, and other conspirators, caused defendant **Muhammad Salman Nasir** to be named as a director for defendant **Reliable Ventures**.
- e. On or about April 2, 2020, defendants **Abdul Hadi Murshid** and other conspirators caused defendant **Muhammad Salman Nasir**, to be added as

a signatory to the **Reliable Ventures** Bank of America account number ending in 2497.

- f. On or about May 3, 2020, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, placed and caused to be placed an advertisement for employment in a newspaper for Company 8.
- g. On or about June 12, 2020, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form ETA-9089 to DOL on behalf of Company 8 for visa seeker K.S.A. utilizing defendant **Law Offices of D. Robert Jones**.
- h. On or about June 26, 2020, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form ETA-9089 to DOL on behalf of Company 8 for visa seeker A.Q. utilizing defendant **Law Offices of D. Robert Jones**.
- i. On or about June 26, 2020, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form ETA-9089 to DOL on behalf of Company 5 for visa seeker J.M.I. utilizing defendant **Law Offices of D. Robert Jones**.
- j. On or about September 18, 2020, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir** caused Wells Fargo Bank account number ending in 7999 to be opened in the name of defendant **Reliable Ventures**. **Murshid** and **Nasir** had sole signature authority on the account.

- k. On or about September 20, 2020, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, placed and caused to be placed an advertisement for employment in a newspaper for defendant **Reliable Ventures**.
- l. On or about September 27, 2020, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, placed and caused to be placed an advertisement for employment in a newspaper for defendant **Reliable Ventures**.
- m. On or about December 17, 2020, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify a Form ETA-9089 on behalf of Company 8 for visa seeker K.S.A. utilizing defendant **Law Offices of D. Robert Jones**.
- n. On or about December 31, 2020, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition to USCIS on behalf of Company 8 for K.S.A., with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.
- o. On or about December 31, 2020, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-485 to USCIS for K.S.A. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.

- p. On or about December 31, 2020, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form 485J Supplement to USCIS for K.S.A. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.
- q. On or about January 14, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify a Form ETA-9089 on behalf of Company 5 for visa seeker J.M.I. utilizing defendant **Law Offices of D. Robert Jones**.
- r. On or about January 19, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify a Form ETA-9089 on behalf of Company 8 for visa seeker A.Q. utilizing defendant **Law Offices of D. Robert Jones**.
- s. On or about January 20, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form ETA-9089 to DOL on behalf of defendant **Reliable Ventures** for visa seeker S.S. utilizing defendant **Law Offices of D. Robert Jones**.
- t. On or about January 24, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, placed and caused to be placed an advertisement for employment in a newspaper for Company 1.

- u. On or about January 31, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, placed and caused to be placed an advertisement for employment in a newspaper for Company 1.
- v. On or about April 9, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused an USCIS to Approve Company 8's Form I-140 Petition for visa seeker K.S.A.
- w. On or about April 9, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition to USCIS on behalf of Company 8 for visa seeker A.Q. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.
- x. On or about May 10, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form ETA-9089 to DOL on behalf of Company 1 for visa seeker S.M. utilizing defendant **Law Offices of D. Robert Jones**.
- y. On or about May 12, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition to USCIS on behalf of Company 5 for J.M.I. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.
- z. On or about May 12, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused

to be submitted a Form I-485 to USCIS for J.M.I. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.

- aa. On or about May 12, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form 485J Supplement to USCIS for J.M.I. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.
- bb. On or about May 12, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form ETA-9089 to DOL on behalf of Company 2 for visa seeker K.K. utilizing defendant **Law Offices of D. Robert Jones**.
- cc. On or about May 25, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form ETA-9089 to DOL on behalf of defendant **Reliable Ventures** for visa seeker F.S.K. utilizing defendant **Law Offices of D. Robert Jones**.
- dd. On or about June 2, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused USCIS to approve Company 5's Form I-140 Petition on behalf of visa seeker J.M.I.
- ee. On or about June 4, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused USCIS to approve Company 8's Form I-140 Petition on behalf of visa seeker A.Q.

- ff. On or about June 30, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify a Form ETA-9089 on behalf of defendant **Reliable Ventures** for visa seeker S.S. utilizing defendant **Law Offices of D. Robert Jones**.
- gg. On or about August 9, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-485 to USCIS for S.S. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.
- hh. On or about August 13, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form 485J Supplement to USCIS for S.S.
- ii. On or about August 13, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition to USCIS on behalf of defendant **Reliable Ventures** for S.S. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.
- jj. On or about August 26, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused USCIS to approve defendant **Reliable Ventures**'s Form I-140 Petition on behalf of visa seeker S.S.

- kk. On or about August 29, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, placed and caused to be placed an advertisement for employment in a newspaper for Company 6.
- ll. On or about September 5, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, placed and caused to be placed an advertisement for employment in a newspaper for Company 3.
- mm. On or about September 5, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, placed and caused to be placed an advertisement for employment in a newspaper for Company 6.
- nn. On or about September 12, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, placed and caused to be placed an advertisement for employment in a newspaper for Company 3.
- oo. On or about November 3, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify a Form ETA-9089 on behalf of Company 1 for visa seeker S.M. utilizing defendant **Law Offices of D. Robert Jones**.
- pp. On or about December 7, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form ETA-9089 to DOL on behalf of Company 3 for visa seeker T.A.D. utilizing defendant **Law Offices of D. Robert Jones**.
- qq. On or about December 9, 2021, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused

- to be submitted a Form ETA-9089 to DOL on behalf of Company 6 for visa seeker R.S.W. utilizing defendant **Law Offices of D. Robert Jones.**
- rr. On or about January 23, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, placed and caused to be placed an advertisement for employment in a newspaper for Company 3.
- ss. On or about January 30, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, placed and caused to be placed an advertisement for employment in a newspaper for Company 3.
- tt. On or about February 9, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify a Form ETA-9089 on behalf of Company 2 for visa seeker K.K. utilizing defendant **Law Offices of D. Robert Jones.**
- uu. On or about February 14, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form ETA-9089 to DOL on behalf of Company 3 for visa seeker M.S.Z. utilizing defendant **Law Offices of D. Robert Jones.**
- vv. On or about February 25, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify a Form ETA-9089 on behalf of defendant **Reliable Ventures** for visa seeker F.S.K. utilizing defendant **Law Offices of D. Robert Jones.**
- ww. On or about March 18, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused

to be submitted a Form I-485 to USCIS for K.K. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.

xx. On or about March 18, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition to USCIS on behalf of Company 2 for K.K. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.

yy. On or about March 28, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form ETA-9089 to DOL on behalf of Company 3 for visa seeker K.B. utilizing defendant **Law Offices of D. Robert Jones**.

zz. On or about March 31, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition to USCIS on behalf of defendant **Reliable Ventures** for F.S.K. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**

aaa. On or about April 1, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused an EB-3 Visa to be issued for K.K.

bbb. On or about April 1, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused

to be submitted a Form I-485 to USCIS for F.S.K. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.

- ccc. On or about April 5, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused a Form I-551 Permanent Resident Card to be issued for J.M.I.
- ddd. On or about April 15, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form ETA-9089 to DOL on behalf of Company 3 for visa seeker M.F. utilizing defendant **Law Offices of D. Robert Jones**.
- eee. On or about April 15, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused USCIS to approve defendant **Reliable Ventures's** Form I-140 Petition on behalf of visa seeker F.S.K.
- fff. On or about April 26, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition on behalf of Company 1 to USCIS for S.M.
- ggg. On or about June 2, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused a Form I-551 Permanent Resident Card to be issued for S.S.

- hhh. On or about June 3, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused a Form I-551 Permanent Resident Card to be issued for K.S.A.
- iii. On or about June 14, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form ETA-9089 to DOL on behalf of Company 1 for visa seeker M.O. utilizing defendant **Law Offices of D. Robert Jones**.
- jjj. On or about September 6, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused an EB-2 Visa to be issued for S.M.
- kkk. On or about September 6, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form 485J Supplement to USCIS for F.S.K. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**
- lll. On or about October 19, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify a Form ETA-9089 on behalf of Company 3 for visa seeker M.S.Z. utilizing defendant **Law Offices of D. Robert Jones**.
- mmm. On or about November 16, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify a Form ETA-9089 on behalf of Company 3 for visa seeker T.A.D. utilizing defendant **Law Offices of D. Robert Jones**.

- nnn. On or about November 17, 2022, Attorney 2 caused to be opened a JPMorgan Chase Bank, National Association (“Chase Bank”) account with account number ending in 6831 to be opened in the name of **Law Offices of D. Robert Jones**.
- ooo. On or about November 28, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-485 to USCIS for S.M with the preparer’s business listed as defendant **Law Offices of D. Robert Jones**.
- ppp. On or about December 1, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify a Form ETA-9089 on behalf of Company 6 for visa seeker R.S.W. utilizing defendant **Law Offices of D. Robert Jones**.
- qqq. On or about December 5, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition to USCIS on behalf of Company 3 for T.A.D. with the preparer’s business listed as defendant **Law Offices of D. Robert Jones**.
- rrr. On or about December 5, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-485 to USCIS for T.A.D. with the preparer’s business listed as defendant **Law Offices of D. Robert Jones**.

- sss. On or about December 14, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused a Form I-551 Permanent Resident Card to be issued for F.S.K.
- ttt. On or about December 21, 2022, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused an EB-3 Visa to be issued for T.A.D.
- uuu. On or about January 4, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify a Form ETA-9089 on behalf of Company 3 for visa seeker M.F. utilizing defendant **Law Offices of D. Robert Jones**.
- vvv. On or about February 6, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition to USCIS on behalf of Company 3 for M.S.Z. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.
- www. On or about February 6, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-485 to USCIS for M.S.Z. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.
- xxx. On or about February 21, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify

a Form ETA-9089 on behalf of Company 3 for visa seeker K.B. utilizing defendant **Law Offices of D. Robert Jones.**

- yyy. On or about February 22, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused an EB-3 Visa to be issued for M.S.Z.
- zzz. On or about February 23, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition to USCIS on behalf of Company 3 for M.F. with the preparer's business listed as defendant **Law Offices of D. Robert Jones.**
- aaaa. On or about February 23, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-485 to USCIS for M.F. with the preparer's business listed as defendant **Law Offices of D. Robert Jones.**
- bbbb. On or about March 3, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition to USCIS on behalf of Company 6 for R.S.W. with the preparer's business listed as defendant **Law Offices of D. Robert Jones.**
- cccc. On or about March 3, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused

to be submitted a Form I-485 to USCIS for R.S.W. with the preparer's business listed as defendant **Law Offices of D. Robert Jones.**

- dddd. On or about March 13, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused an EB-3 Visa to be issued for M.F.
- eeee. On or about March 21, 2023, defendant **Abdul Hadi Murshid** and other conspirators caused a website for defendant **Reliable Ventures** to be registered with the domain thereliableventures[.]com.
- ffff. On or about March 29, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused DOL to certify a Form ETA-9089 on behalf of Company 1 for visa seeker M.O. utilizing defendant **Law Offices of D. Robert Jones.**
- gggg. On or about April 25, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-485 to USCIS for M.O. with the preparer's business listed as defendant **Law Offices of D. Robert Jones.**
- hhhh. On or about April 25, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition on behalf of Company 1 for M.O. with the preparer's business listed as defendant **Law Offices of D. Robert Jones.**

- iii. On or about May 5, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused a Form I-551 Permanent Resident Card to be issued for M.S.Z.
- jjjj. On or about May 26, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused a Form I-551 Permanent Resident Card to be issued for M.F.
- kkkk. On or about June 1, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-140 Petition to USCIS on behalf of Company 3 for K.B. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.
- llll. On or about June 14, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused a Form I-551 Permanent Resident Card to be issued for S.M.
- mmmm. On or about June 26, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form I-485 to USCIS for K.B. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.
- nnnn. On or about June 27, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form 485J Supplement to USCIS for K.B. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.

oooo. On or about July 18, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused an EB-3 Visa to be issued for K.B.

pppp. On or about August 29, 2023, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused an EB-3 Visa to be issued for R.S.W.

qqqq. On or about May 22, 2024, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form 485J Supplement to USCIS for K.K. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.

rrrr. On or about June 20, 2024, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, caused a Form I-551 Permanent Resident Card to be issued for R.S.W.

ssss. On or about June 26, 2024, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form 485J Supplement to USCIS for K.B. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.

tttt. On or about June 27, 2024, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, and other conspirators, submitted and caused to be submitted a Form 485J Supplement to USCIS for T.A.D. with the preparer's business listed as defendant **Law Offices of D. Robert Jones**.

All in violation of 18 U.S.C. § 371 (18 U.S.C. § 1546(a)).

Counts Two Through Thirteen  
 False and Fraudulent Statements in Immigration Documents  
 [Violations of 18 U.S.C. §§ 1546(a) and 2]

87. Paragraphs 1 through 81 and 86 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

88. On or about the dates set forth below, in the Dallas Division of the Northern District of Texas and elsewhere, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir** aided and abetted by each other, and aiding and abetting others, known and unknown to the Grand Jury, did knowingly present and make under oath and subscribe as true under penalty of perjury under 28 U.S.C. § 1746, a false statement with respect to a material fact in an application, affidavit, and document required by the immigration laws and regulations prescribed thereunder, that:

<b>Count</b>	<b>Date of application</b>	<b>Visa Seeker</b>	<b>Purported Employer</b>	<b>Document</b>
Two	December 31, 2020	K.S.A.	Company 8	Form I-140 Petition
Three	April 9, 2021	A.Q.	Company 8	Form I-140 Petition
Four	May 12, 2021	J.M.I.	Company 5	Form I-140 Petition
Five	August 13, 2021	S.S.	<b>Reliable Ventures</b>	Form I-140 Petition
Six	March 18, 2022	K.K.	Company 2	Form I-140 Petition
Seven	March 31, 2022	F.S.K.	<b>Reliable Ventures</b>	Form I-140 Petition
Eight	April 26, 2022	S.M.	Company 1	Form I-140 Petition
Nine	December 5, 2022	T.A.D.	Company 3	Form I-140 Petition
Ten	February 6, 2023	M.S.Z.	Company 3	Form I-140 Petition
Eleven	February 23, 2023	M.F.	Company 3	Form I-140 Petition

<b>Count</b>	<b>Date of application</b>	<b>Visa Seeker</b>	<b>Purported Employer</b>	<b>Document</b>
Twelve	March 3, 2023	R.S.W.	Company 6	Form I-140 Petition
Thirteen	June 1, 2023	K.B.	Company 3	Form I-140 Petition

All in violation of 18 U.S.C. §§ 1546(a) and 2.

Count Fourteen  
Conspiracy to Commit Money Laundering  
[Violations of 18 U.S.C. §§ 1956(h) and 1956(a)(1)(B)(i)]

89. Paragraphs 1 through 81 and 86 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

90. From in January 2018, through in or about May 21, 2025, in the Northern District of Texas and elsewhere, defendants **Abdul Hadi Murshid, Muhammad Salman Nasir, Law Offices of D. Robert Jones, and Reliable Ventures**, did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to conduct and attempt to conduct a financial transaction affecting interstate commerce and foreign commerce involving the proceeds of specified unlawful activity, that is, false and fraudulent statements in immigration documents in violation of Title 18, United States Code, Section 1546(a), knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct the financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of 18 U.S.C. § 1956(h) and 1956(a)(1)(B)(i).

Count Fifteen  
Racketeer Influenced and Corrupt Organizations Act Conspiracy  
[Violations of 18 U.S.C. § 1962(d)]

91. Paragraphs 1 through 81 this Indictment are realleged and incorporated by reference as though fully set forth herein.

The Enterprise

92. As described in detail in paragraphs 1 through 81 of this Indictment and below, defendants **Abdul Hadi Murshid, Muhammad Salman Nasir and Reliable Ventures, Inc.**, and others known and unknown to the Grand Jury, were part of a criminal organization that engaged in illegal activities, to include visa fraud and other crimes, in the Northern District of Texas and elsewhere. The organization, including its leaders, members, and associates, constituted an enterprise as defined in 18 U.S.C. § 1961(4), that is, a group of individuals and entities associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce (“the Enterprise”). The Enterprise constituted an ongoing organization whose leaders, members, and associates functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

93. The criminal organization, including its leadership, members, and associates, constituted an Enterprise, as that term is defined under 18 U.S.C. § 1961(4), namely, a group of entities and individuals associated in fact and referred to in this Indictment as the “Enterprise.” The Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of

achieving the objectives of the Enterprise. The Enterprise was engaged in, and its activities affected, interstate and foreign commerce.

Purposes of the Enterprise

94. The purposes of the Enterprise included, but were not limited to, the following:

- a. enriching its leaders, members, and associates through various forms of illegal activity, including creation and filing of false and fraudulent visa and immigration applications for foreign nationals seeking to enter and remain in the United States, and by soliciting, demanding, and accepting payment from such foreign nationals;
- b. promoting and enhancing the Enterprise and the activities of its members and associates; and
- c. concealing and evading detection of the Enterprise's illegal activities by immigration and law enforcement officials.

Manner and Means of the Enterprise

95. The manner and means by which members and associates of the Enterprise conducted and participated in the conduct of the affairs of the Enterprise included, among others, the following:

- a. Members and associates of the Enterprise recruited and advertised, through the internet and word of mouth, to foreign nationals seeking a visa to work, live, and remain in the United States.

- b. Members and associates of the Enterprise caused foreign national visa seekers to pay money to the members and associates of the Enterprise and caused money to be deposited into bank accounts controlled by members and associates of the Enterprise.
- c. Members of the Enterprise caused classified job advertisements to run in a newspaper for non-existent jobs, claiming to be businesses in need of employees.
- d. Members and associates of the Enterprise caused false and fraudulent documents to be created, which thereafter were submitted to the DOL.
- e. Members and associates of the enterprise defrauded, and caused the defrauding of, agencies and departments of the United States government when applying for EB-2, EB-3, and H1-B visas on behalf of foreign national visa seekers.
- f. Members and associates of the Enterprise submitted and caused to be submitted false and fraudulent visa applications, including, Forms I-140 and I-129 to USCIS, claiming to be businesses that had jobs for foreign national visa seekers identified in the visa applications.
- g. Members and associates of the Enterprise submitted and caused to be submitted Form I-485 to USCIS in order to adjust the visa seekers' status in the United States to an LPR.
- h. Members and associates of the Enterprise caused money provided by foreign national visa seekers to be transmitted to one or more businesses

controlled by members and associates of the Enterprise, and thereafter, the businesses would cause the money to be transferred to foreign national visa seekers as purported payroll, even though the visa seeker never worked at the business.

- i. Members and associates of the Enterprise concealed and laundered fraud proceeds through financial transactions using multiple bank accounts and concealed the scheme through fraudulent and obstructive means.

Racketeering Conspiracy

96. From in or about January 2018 and continuing through on or about May 21, 2025, in the Northern District of Texas and elsewhere, defendants **Abdul Hadi Murshid**, **Muhammad Salman Nasir**, and **Reliable Ventures**, and others known and unknown to the Grand Jury, being persons employed by and associated with the Enterprise, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally combine, conspire, confederate, and agree with one another to violate 18 U.S.C. § 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise through a pattern of racketeering activity, as defined in 18 U.S.C. § 1961(1) and (5), which pattern of racketeering activity consisted of multiple acts indictable under 18 U.S.C. § 1546 (relating to fraud and misuse of visas, permits, and other documents) and 18 U.S.C. § 1956 (relating to the laundering of monetary instruments).

97. It was further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the Enterprise's affairs.

Overt Acts

98. In furtherance of the racketeering conspiracy and to accomplish the object of the conspiracy, the defendants **Abdul Hadi Murshid, Muhammad Salman Nasir, and Reliable Ventures**, and others known and unknown to the Grand Jury, committed, and caused to be committed, within the Northern District of Texas and elsewhere, the overt acts, among others, identified in sub-paragraphs 86 a. through 86 tttt.

All in violation of 18 U.S.C. § 1962(d).

Count Sixteen  
Procurement of Citizenship or Naturalization Unlawfully  
[Violations of 18 U.S.C. § 1425(b)]

99. Paragraphs 1 through 81 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

100. From on or about May 1, 2015 through on or about November 1, 2018, in the Northern District of Texas and elsewhere, defendant **Abdul Hadi Murshid**, a person not entitled to naturalization and citizenship, did knowingly procure and obtain and apply for and otherwise attempt to procure and obtain naturalization and citizenship for himself, to which he was not entitled, namely:

- a. Defendant **Abdul Hadi Murshid** was not a person of good moral character because he provided false testimony under oath in connection with his application for naturalization and was therefore ineligible for naturalization, to wit:
  - i. in his N-400 Application, which he was interviewed under oath about by a USCIS officer, the defendant stated no when asked “Have you **EVER** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **NOT** arrested;”
  - ii. in his N-400 Application, which he was interviewed under oath about by a USCIS officer, the defendant stated no when asked “Have you **EVER** given any U.S. Government officials **any** information or documentation that was false, fraudulent, or misleading;” and
  - iii. in his N-400 Application, which he was interviewed under oath about by a USCIS officer, the defendant stated no when asked “Have

you **EVER** lied to any U.S. Government officials to gain entry or admission into the United States or to gain immigration benefits while in the United States?"

- b. Defendant **Abdul Hadi Murshid** was not a person of good moral character because he committed an unlawful act which adversely reflected upon his moral character, to wit:
- i. in his Form N-400 Application, which he attested to under penalty of perjury, the defendant answered no to the question "Have you **EVER** committed, assisted in committing, or attempted to commit, a crime or offense for which you were **NOT** arrested;"
  - ii. in his Form N-400 Application, which he attested to under penalty of perjury, the defendant answered no to the question "Have you **EVER** given any U.S. Government officials any information or documentation that was false, fraudulent, or misleading;" and
  - iii. in his Form N-400 Application, which he attested to under penalty of perjury, the defendant answered no to the question "Have you **EVER** lied to any U.S. Government officials to gain entry or admission into the United States or to gain immigration benefits while in the United States?"

In violation of 18 U.S.C. § 1425.

Count Seventeen  
Procurement of Citizenship or Naturalization Unlawfully  
[Violations of 18 U.S.C. § 1425(b)]

101. Paragraphs 1 through 81 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

102. From on or about August 18, 2018, through on or about July 22, 2024, in the Northern District of Texas and elsewhere, defendant **Muhammad Salman Nasir**, a person not entitled to naturalization and citizenship, aided and abetted by defendant **Abdul Hadi Murshid**, did knowingly apply for and otherwise attempt to procure and obtain naturalization and citizenship for himself, to which he was not entitled, namely:

- a. Defendant **Muhammad Salman Nasir**'s permanent residence status was unlawfully obtained and **Nasir** was therefore ineligible for naturalization, to wit:
  - i. in his Form I-485 Application, which he was interviewed about under oath by a USCIS officer, defendant **Muhammad Salman Nasir** answered "no" when asked: "Have you EVER committed a crime of any kind (even if you were not arrested, cited, charged with, or tried for that crime);"
  - ii. in his Form I-485 Application, which he was interviewed about under oath by a USCIS officer, defendant **Muhammad Salman Nasir** answered "no" when asked: "Have you EVER engaged in money laundering or have you EVER knowingly aided, assisted, conspired, or colluded with others in money laundering or do you seek to enter the United States to engage in such activity;" and

- iii. in his Form I-485 Application, which he was interviewed about under oath by a USCIS officer, defendant **Muhammad Salman Nasir** answered “no” when asked: “Have you EVER submitted fraudulent or counterfeit documentation to any U.S. Government official to obtain or attempt to obtain any immigration benefit, including a visa or entry into the United States;”
- iv. in his Form I-485 Application, which he was interviewed about under oath by a USCIS officer, defendant **Muhammad Salman Nasir** answered “no” when asked: “Have you EVER lied about, concealed, or misrepresented any information on an application or petition to obtain a visa, other documentation required for entry into the United States, admission to the United States, or any other kind of immigration benefit;” and
- v. in his Form I-485 Application, which he was interviewed about under oath by a USCIS officer, defendant **Muhammad Salman Nasir** answered “no” when asked: “Have you EVER knowingly encouraged, induced, assisted, abetted, or aided any forging national to enter or to try to enter the United States illegally (alien smuggling)?”

b. Defendant **Muhammad Salman Nasir** was not a person of good moral character because he committed an unlawful act which adversely reflected upon his moral character and was therefore ineligible for naturalization, to wit:

- i. in his Form N-400 Application, which he attested to under penalty of perjury, defendant **Muhammad Salman Nasir** answered “no” when asked: “Have you EVER committed, agreed to commit, asked someone else to commit, helped commit, or tried to commit a crime or offense for which you were NOT arrested;”
- ii. in his Form N-400 Application, which he attested to under penalty of perjury, defendant **Muhammad Salman Nasir** answered “no” when asked: “Have you EVER given any U.S. Government officials any information or documentation that was false, fraudulent, or misleading;” and
- iii. in his Form N-400 Application, which he attested to under penalty of perjury, defendant **Muhammad Salman Nasir** answered “no” when asked: “Have you EVER lied to any U.S. Government officials to gain entry or admission into the United States or to gain immigration benefits while in the United States?”

In violation of 18 U.S.C. § 1425.

First Notice of Forfeiture  
[18 U.S.C. § 982(a)(1); 18 U.S.C. § 982(a)(6)]

103. Upon conviction for any offense alleged in Counts One through Thirteen, Sixteen, and Seventeen of this Indictment, pursuant to 18 U.S.C. § 982(a)(6), defendants **Abdul Hadi Murshid, Muhammad Salman Nasir, Law Offices of D. Robert Jones, and Reliable Ventures** shall forfeit to the United States any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the person is convicted; any property real or personal that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted; and any property real or personal that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the person is convicted.

104. Upon conviction for the offense alleged in Count Fourteen of this Indictment, pursuant to 18 U.S.C. § 982(a)(1), defendants **Abdul Hadi Murshid, Muhammad Salman Nasir, Law Offices of D. Robert Jones, and Reliable Ventures** shall forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

105. The property subject to forfeiture includes, but is not limited to, the following:

Vehicles

a. 1990 Silver Bentley Mulsanne S, 4-Door Sedan, bearing vehicle identification number (“VIN”): SCBZS02D6LCX31992, registered in the name of

defendant **Muhammad Salman Nasir**;

- b. 1972 Maroon Mercedes 300 SEL, 4-Door, bearing VIN: 10905712000954, registered in the name of defendant **Muhammad Salman Nasir**;
- c. 2018 Maserati Levante, Black, bearing VIN: ZN661YUL5JX284243, registered in the name of H.K.;
- d. 1947 Cadillac Series 62, Black, bearing VIN: 1A045353 or IA045353, registered in the name of defendant **Muhammad Salman Nasir**; and
- e. 1946 Packard, Black, bearing VIN: F506114, registered in the name of defendant **Muhammad Salman Nasir**.

Real Properties

- a. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1432 Benavites Drive, Little Elm, Texas 75068.
- b. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 4060 Woodbine Lane, Prosper, Texas 75078.
- c. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1684 County Road 3318, Greenville, Texas 75402.
- d. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 7901 Fossil Creek Trail, McKinney, Texas 75071.

Bank Accounts and Safety Deposit Box

a. All United States currency or other monetary instruments credited to the Wells Fargo Bank account with account number ending in 7999 in the name of defendant **Reliable Ventures.**

b. All United States currency or other monetary instruments credited to the Wells Fargo Bank account with account number ending in 5222 in the name of defendant **Abdul Hadi Murshid.**

c. All United States currency or other monetary instruments credited to the Bank of America account with account number ending in 1585 in the name of defendant **Muhammad Salman Nasir.**

d. All United States currency or other monetary instruments credited to the Chase Bank account with account number ending in 8922 in the name of H.K.

e. All currency and other valuables held in Advancial Federal Credit Union Safety Deposit Box 210 located at 6021 Preston Road, Frisco, Texas.

Proceeds

a. Proceeds of the offenses received and seized on or about April 26, 2022 totaling \$7,000 in United States currency;

b. Proceeds of the offenses received and seized on or about February 9, 2023 totaling \$23,760 in United States currency; and

c. Proceeds of the offenses received and seized on or about November 14, 2024 totaling \$21,000 in United States currency.

106. To the extent that the property described above as being subject to forfeiture as a result of any act or omission by the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. have been transferred or sold to, or deposited with, a third party;
- c. have been placed beyond the jurisdiction of the Court;
- d. have been substantially diminished in value; or
- e. have been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), which is incorporated by reference in 18 U.S.C. § 982(b), to seek forfeiture of any other property of the defendants up to the value of the property described above as being subject to forfeiture.

Second Notice of Forfeiture  
[18 U.S.C. § 1963]

107. Upon conviction for the offense alleged in Count Fifteen of this Indictment, pursuant to 18 U.S.C. § 1963, defendants **Abdul Hadi Murshid** and **Muhammad Salman Nasir**, shall forfeit to the United States any interest the person has acquired or maintained in violation of 18 U.S.C. § 1962; any interest in, security of, claim against, and property or contractual right of any kind affording a source of influence, over any enterprise which the person has established, operated, controlled, conducted, or participated in the conduct of, in violation of section 1962; and any property constituting,

or derived from, any proceeds which the person obtained, directly or indirectly, from racketeering activity in violation of 18 U.S.C. § 1962.

108. Property subject to forfeiture includes, but is not limited to, the vehicles, real property, bank accounts, and proceeds identified in the First Notice of Forfeiture.

109. To the extent that the property described above as being subject to forfeiture pursuant to 18 U.S.C. § 1963, as a result of any act or omission by the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. have been transferred or sold to, or deposited with, a third party;
- c. have been placed beyond the jurisdiction of the Court;
- d. have been substantially diminished in value; or
- e. have been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States of America, pursuant to 18 U.S.C. § 1963(m), to seek

[NOTHING ADDITIONAL ON THIS PAGE]

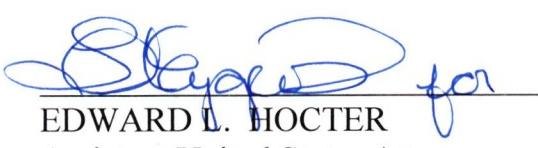
forfeiture of any other property of the defendants up to the value of the property described above as being subject to forfeiture.

All pursuant to Title 18, United States Code, Section 1963.

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON

CHAD E. MEACHAM  
ACTING UNITED STATES ATTORNEY

  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

---

THE UNITED STATES OF AMERICA

v.

**ABDUL HADI MURSHID (01)**  
**MUHAMMAD SALMAN NASIR (02)**  
**LAW OFFICES OF D. ROBERT JONES PLLC (03)**  
**and**  
**RELIABLE VENTURES, INC. (04)**

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SEALED INDICTMENT

18 U.S.C. § 371 (18 U.S.C. 1546(a))  
Conspiracy to Commit Offense and Defraud the United States  
(Count 1)

18 U.S.C. §§ 1546(a) and 2  
False and Fraudulent Statements in Immigration Documents  
(Counts 2-13)

18 U.S.C. §§ 1956(h) and 1956(a)(1)(B)(i)  
Conspiracy to Commit Money Laundering  
(Count 14)

18 U.S.C. § 1962(d)  
Racketeer Influenced and Corrupt Organizations Act Conspiracy  
(Count 15)

18 U.S.C. § 1425(b)  
Procurement of Citizenship or Naturalization Unlawfully  
(Count 16)

18 U.S.C. § 1425(b)  
Procurement of Citizenship or Naturalization Unlawfully  
(Count 17)

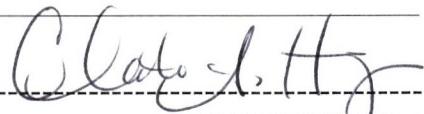
18 U.S.C. § 982(a)(1); 18 U.S.C. § 982(a)(6)  
First Notice of Forfeiture

18 U.S.C. § 1963  
Second Notice of Forfeiture

17 Counts

A true bill rendered

DALLAS



FOREPERSON

Filed in open court this 21<sup>st</sup> day of May, 2025.

**Warrant to be Issued**



UNITED STATES MAGISTRATE JUDGE

No Criminal Matter Pending